

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

In Re:)	19-26526
)	
Charles Noble,)	Chapter 13
)	
Debtor(s).)	Judge LaShonda A. Hunt

NOTICE OF MOTION

TO: See attached Service List

PLEASE TAKE NOTICE that on May 21, 2021, at 10:15 am, or as soon thereafter as counsel may be heard, I shall appear before the Honorable LaShonda A. Hunt, or any other judge sitting in that judge's place, and present the Debtor's **Motion to Modify Plan**, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/join>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and passcode. The meeting ID for this hearing is 161 165 5696 and the passcode is 7490911. Additional information can be found on Judge Hunt's webpage on the court's website: <https://www.ilnb.uscourts.gov/content/judge-lashonda-hunt>.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Charles Noble, Debtor

By: /s/ John J. Ellmann

John J. Ellmann, Attorney for the Debtor(s)
DAVID M. SIEGEL & ASSOCIATES, LLC
790 Chaddick Drive, Wheeling, IL 60090
847/ 520-8100
davidsiegelbk@gmail.com

CERTIFICATE OF SERVICE

I, John Ellmann, Attorney for the Debtor(s), certify that I served a copy of this notice and the attached motion on each entity shown on the Service List at the address shown and by the method indicated on the list on April 28, 2021, at or before 5:00 pm.

_____/s/ John J. Ellmann_____

SERVICE LIST

To the following persons or entities who were served electronically by the Bankruptcy Court:

Glenn Stearns, Ch. 13 Trustee: mcguckin_m@lisle13.com

To the following persons or entities who were served via regular U.S. Mail:

Charles Noble
3441 Chicago Road, #2B
Steger, IL 60475

City of Chicago Department of Finance
c/o Arnold Scott Harris P.C.
111 W. Jackson Ste. 600
Chicago, IL 60604

IRS
Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

ILLINOIS DEPARTMENT OF REVENUE-
BANKRUPTCY
PO BOX 19035
SPRINGFIELD, IL 62794-9035

Village of South Chicago Heights
Municipal Collections of America Inc.
3348 Ridge Road
Lansing IL 60438

Village of East Hazel Crest
Municipal Collections of America Inc.
3348 Ridge Road
Lansing IL 60438

Village Of Olympia Fields
Municipal Collections of America Inc.
3348 Ridge Road
Lansing IL 60438

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

In Re:)	19-29542
)	
Andy and Deborah Lopez,)	Chapter 13
)	
Debtor(s).)	Judge LaShonda A. Hunt

MOTION TO MODIFY PLAN

NOW COMES the Debtor, by and through his attorneys, David M. Siegel & Associates, LLC, and in support of this Motion states as follows:

1. Jurisdiction is proper and venue is fixed in this Court with respect to these parties.
2. On September 19, 2019, the Debtor filed a voluntary petition for relief pursuant to Chapter 13 under Title 11 USC, Glenn Stearns was appointed trustee, and the plan was confirmed on January 24, 2020.
3. The Debtor fell behind in his Trustee payments and couldn't catch up because he became unemployed due to the COVID-19 pandemic.
4. The Debtor is back to work now. He can make payments to the Trustee, but cannot cure the default.
5. The Debtor proposes to amend his chapter 13 plan pursuant to 11 U.S.C. §1329 and per the Coronavirus Aid, Relief and Economic Security (CARES) Act to defer the payment default to the end of the plan. The Debtor makes this proposal in good faith and with the intention of completing his chapter 13 plan.
6. Deferring the payment default will not cause the confirmed chapter 13 plan to run longer than 84 months.

WHEREFORE the Debtor prays this Honorable Court enter an order modifying the plan and for other such relief as this Court deems just and proper.

Respectfully Submitted,

/s/ John J. Ellmann

John J. Ellmann A.R.D.C. #6257894
Attorney for the Debtors

DAVID M. SIEGEL & ASSOCIATES, LLC
Attorneys for the Debtor(s)
790 Chaddick Drive
Wheeling, IL 60090
847/ 520-810